

BARCLAY DAMON ^{LLP}

Erin M. Tyreman
Partner

April 29, 2025

Via Electronic Filing

Hon. Anthony J. Brindisi
United States District Court Judge
U.S. District Court for the Northern District of New York

Re: Jordan Rindgen v. Broome County, et al.
Case No. 3:24-cv-01325 (AJB/ML)

Dear Judge Brindisi:

We represent Defendants District Attorney Michael Korchak and Chief Assistant District Attorney Mark Loughran in the above-referenced matter.

I submit this correspondence as a letter motion seeking permission to file excess pages in our Reply to Plaintiff's Opposition to our Motion for Dismissal such that we request permission to file a Reply of twenty (20) pages in length. The basis for this request is that Plaintiff has filed a Memorandum which totals twenty-nine (29) pages in opposition to our motion, and also incorporates by reference arguments and case citations set forth in his opposition to the County and City Defendants (Dkt. 74). In doing so, the Plaintiff has lumped Korchak and Loughran in collectively with ADAs Congdon and Cronin as "District Attorney Defendants" throughout his Opposition arguing that the "District Attorney Defendants" were involved in the investigation and therefore are not entitled to absolute immunity. To properly Reply and analyze the specific activities of Korchak and Loughran for purposes of the application of absolute immunity, as well as address the arguments regarding the twelve causes of action from the Complaint, we believe that twenty (20) pages will be required.

We thank the Court for its time, attention, and courtesies in this matter.

Very truly yours,

/s/ Erin M. Tyreman
Erin M. Tyreman
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